REMARKS

In this response to the above identified office action the Applicants amend the application and seek reconsideration thereof. In this response, the Applicants amend claims 1-6 and 8-11. The Applicants do not add any claims or cancel any claims. Accordingly, claims 1-23 are pending.

I.   Claim Objections

Claim 1 has been objected to for including terms having insufficient antecedent basis. The Applicants have amended claim 1 to correct the antecedent basis of the terms identified by the Examiner. Accordingly, reconsideration and withdrawal of the objection to claim 1 are requested.

Claims 8-10 have been objected for including informalities. The Examiner noted that these claims incorrectly depended from claim 6. The Applicants have amended these claims to depend from independent claim 7.

II.   Claims rejected under 35 U.S.C. §112

Claims 1-6 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim that which the Applicants regard as the invention. The Examiner has indicated that it was unclear "as to what is generating the interrupt." The Applicants have amended claim 1 to clarify the subject matter which the Applicants desire to claim. The Applicants believe these amendments address the issues raised by the Examiner. Accordingly, reconsideration and withdrawal of the indefiniteness rejection of claim 1 are requested.

Claims 2-6 were rejected for depending on claim 1. Thus, for the reason mentioned in regard to claim 1, the Applicants respectfully request that the rejection of claims 2-6 be reconsidered and withdrawn.

III. Claims rejected under 35 U.S.C. §102

Claims 1, 2, and 4 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,590,312 issued to Marisetty (hereinafter "Marisetty").

In regard to independent claim 1, this claim as amended includes the elements of "identifying a resource in a computer system that is capable of generating an interrupt" and "configuring the resource to access the address range." The Applicants have reviewed Marisetty but have been unable to discern any part of Marisetty that teaches these elements of claim 1. Marisetty appears to be directed towards emulating missing resources in a computer system and not configuring existing resources to access a specified address range. See Marisetty, col. 3, lines 53-58. Thus, the Applicants believe that Marisetty does not teach each of the elements of claim 1. Accordingly, reconsideration and withdrawal of the anticipation rejection of claim 1 are requested.

Claims 2 and 4 depend from independent claim 1 and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to independent claim 1 these claims are not anticipated by Marisetty.

IV. Claims rejected under 35 U.S.C. §103

Claims 3 and 5-23 stand rejected under 35 U.S.C. §103 as being unpatentable over Marisetty in view of U.S. Patent No. 6,219,742 issued to Stanley (hereinafter "Stanley").

In regard to claims 3, 5 and 6 these claims depend from independent claim and incorporate the limitations thereof. Thus, for at least for the reasons mentioned above in regard to independent claim 1, Marisetty does not teach or suggest each of the elements of these claims. Further, Stanley does not cure this defect of Marisetty. The Examiner has not indicated and the Applicants have been unable to discern any part of Stanley that teaches "identifying a resource in a computer system that generates an interrupt" and "configuring the resource to access the address range." Thus, Marisetty in view of Stanley does not teach or suggest each of the elements of claims 3, 5 and 6. Accordingly, reconsideration and withdrawal of the obviousness rejection of these claims are requested.

In regard to claim 7, this claim includes the elements of "invoking an advance configuration and power interface source language (ASL) code assigned to the address access request." The Examiner acknowledges that Marisetty fails to reach these elements of claim 7. The Examiner relies on Stanley for teaching these elements of claim 7. The Examiner cites col. 11, lines 5-65 of Stanley as supporting this assertion. However, the Applicants have reviewed Stanley and the cited section and believe that Stanley, in fact, teaches away from these elements. Stanley teaches the use of a general purpose event register, which is a hardware device in which a general purpose status event bit is set when a device needs to be serviced. An interrupt is then generated to invoke an event handler for that device. See col. 11, lines 5-15 and col. 3, lines 12-19 of Stanley. Thus, Stanley does not teach invoking an ASL code that has been assigned to an address access request.

Further, the Examiner's justification for combining Marisetty and Stanley is "for the purpose of having software assisted solutions to hardware related problems in order to mitigate risk" and "to provide software emulation in place of unavailable hardware to use less circuitry."

However, Marisetty already teaches a system that emulates missing hardware if in an attempt to utilize or access this hardware is made. Marisetty's emulation is entirely in software. Thus, it is unclear to the Applicants why one of ordinary skill in the art would think to combine the teachings of Stanley with the systems of Marisetty based on the reasoning provided by the Examiner because Marisetty already has a complete solution to its technical problem and it is unclear how any teaching of Stanley would improve this solution to motivate one of ordinary skill in the art to combine Stanley with Marisetty. In fact, Stanley appears to teach away from the entirely software solution utilized by Marisetty. Stanley teaches using a mixture of hardware and software where the software assists the hardware but does not replace it. Specifically, Stanley teaches the use of a general purpose event register that is a hardware device which is assisted by software. See column 2, line 64 through column 3, line 11. Thus, one of ordinary skill in the art would not have been motivated to combine teachings of Marisetty with Stanley. Accordingly, reconsideration and withdrawal of the obviousness rejection of claim 7 are requested.

Claims 8-10 depend from independent claim 7 and incorporate limitations thereof. Thus, at least for the reasons mentioned above in regard to independent claim 7, these claims are not obvious over Marisetty in view of Stanley. Accordingly, reconsideration and withdrawal of the obviousness rejection of these claims are requested.

In regard to claim 11, this claim includes the elements of "means for configuring the resource to access the address range." As discussed in regard to independent claim 1, Marisetty does not teach or suggest these elements. Further, Stanley does not cure these defects of Marisetty. The Examiner has not indicated and the Applicants have been unable to discern any part of Stanley that teaches or suggest these elements of claim 11. Therefore, Marisetty in view

of Stanley does not teach or suggest each of the elements of claim 11. Accordingly, reconsideration and withdrawal of the obviousness rejection of claim 11 are requested.

In regard to claims 12 and 13, these claims depend from independent claim 11 and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to independent claim 11, these claims are not obvious over Marisetty in view of Stanley. Accordingly, reconsideration and withdrawal of the obviousness rejection of these claims is requested.

In regard to claim 14, this claims includes the elements of "an operating system level handler." The Examiner equates this element with an SMM handler of Marisetty. However, the SMM handler of the Marisetty is not an operating system level interrupt handler. Claim 14 also includes the elements of "an operating system level interrupt handler module to receive an interrupt when a module detects an address space access and to invoke the ASL code segment corresponding to the address space access." The Examiner acknowledges that Marisetty fails to teach invoking an ASL code signal corresponding to an address base access and relies on Stanley to cure this defect of Marisetty. Thus, for the same reasons mentioned above in regard to independent claim 7, Marisetty cannot be properly combined with Stanley to teach or suggest each of the elements of claim 14. Accordingly, reconsideration and withdrawal of the obviousness rejection of claim 14 are requested.

Claims 15 and 16 depend from independent claim 14 and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to independent claim 14, these claims are not obvious over Marisetty in view of Stanley. In regard to claim 17, the Examiner has not set forth how the cited references teach or suggest each of the elements of this claims. Rather, the Examiner dismisses this claim as a system claim of claim 1 and as obvious over the

cited references for the reasons mentioned in regard to claim 1. However, claim 17 includes elements distinct from those of claim 1 including "an operating system module... to register a device driver to manage a system resource, the operating system module invoking the ACPI module when a memory access is received that corresponds to an address range registered by a device driver." Thus, the Examiner has failed to allege that each of the elements of claim 17 are taught or suggested by the cited references. Therefore the Examiner has failed to establish a *prima facie* case of obviousness for claim 17. Accordingly, reconsideration and withdrawal of the obviousness rejection of claim 17 are requested.

Claims 18 and 19 depend from independent claim 17 and incorporate the limitations thereof. Thus, for at least for reasons mentioned above in regard to claim 17, these claims are not obvious over Marisetty in view of Stanley.

In regard to claim 20 this claim includes elements similar to those in claim 7 including "invoking an advanced configuration power interface source language code assigned to the address access request." Thus, at least for the reasons mentioned above in regard to independent claim 7, Marisetty in view of Stanley does not teach or suggest each of the elements of claim 20. Accordingly, reconsideration and withdrawal of the obviousness rejection of claim 20 are requested.

In regards to claims 21-23 these claims depend from independent claim 20 and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to claim 20, these claims are not obvious over the cited references. Reconsideration and withdrawal of the obviousness rejection of these claims are requested.
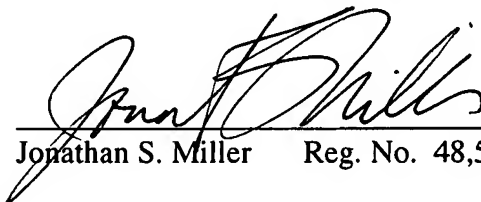
CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely claims 1-23, patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207 3800.

Respectfully submitted,

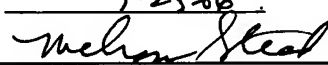BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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Jonathan S. Miller   Reg. No. 48,534

12400 Wilshire Boulevard, Seventh Floor
Los Angeles, California 90025
(310) 207-3800